



Department of Environmental Quality, Waste & Hazardous Materials Division
UNIVERSAL WASTE
LARGE QUANTITY HANDLER (LQH) INSPECTION

Facility Name _____

Part 2 Rules

Date _____ I.D. # _____

1994 PA 451

UNIVERSAL WASTE	QUANTITY (>5000 kg or 11,000 lbs/year)

Examples: batteries, various pesticides, thermostats, mercury switches, mercury thermometers, waste devices which contain only elemental mercury, electric lamps (fluorescent, high intensity discharge (HID), sodium vapor, mercury vapor, neon, metal halide, incandescent lamps, and cathode ray tubes (CRTs) from computers, televisions, etc.)

NI - Not Inspected

N/A - Not Applicable

PROHIBITIONS (Rule 228(5): 40 CFR 273.31)

YES NO

1. LQH disposed of universal waste? (Rule 228(5): 40 CFR 273.31(a))	UWR	___ [] NI N/A
2. LQH diluted or treated universal waste, except responding to releases or managing certain waste? (Rule 228(5): 40 CFR 273.31(b))	UWR	___ [] NI N/A

NOTIFICATION (Rule 228(5): 40 CFR 273.32)

3. Notified DEQ (form EQP5150) & received EPA ID number before exceeding 5000 kg)?(Rule 228(5): 40 CFR 273.32(a)(1))	UWR	[] ___ NI N/A
4. Maintained the LQG designation to end of the calendar year? (Rule 228(5)(a): 40 CFR 273.32)	UWR	[] ___ NI N/A

WASTE MANAGEMENT (Rule 228(5): 40 CFR 273.33)

Universal Waste Batteries: (Rule 228(5): 40 CFR 273.33(a))

5. Are batteries that show evidence of leakage, spillage, or damage that could cause leaks contained? (Rule 228(5): 40 CFR 273.33(a)(1))	UWR	[] ___ NI N/A
6. If batteries are contained, were containers closed & structurally sound, compatible w/ the contents of the battery & lack evidence of leakage, spillage or damage that could cause leakage? (Rule 228(5): 40 CFR 273.33(a)(1))	UWR	[] ___ NI N/A
7. Only the following activities allowed: sorted by type, mixed types in a container, discharged to remove electric charge, regenerated, disassembled into individual batteries or cells, removed from consumer products or electrolyte removed & castings of each battery not breached, intact & closed (except to remove electrolyte)? (Rule 228 (5): 40 CFR 273.33(a)(2))	UWR	[] ___ NI N/A
8. If electrolyte was removed or other wastes generated, is it determined whether it was hazardous waste? (Rule 228(5): 40 CFR 273.33(a)(3))	UWR	[] ___ NI N/A
a. If electrolyte or other waste is characteristic is it managed in compliance w/ Part 260-272? (Rule 228(5): 40 CFR 273.33(a)(3)(i))	UWR	[] ___ NI N/A
b. If electrolyte or other waste was not characteristic, is it managed in compliance w/ Part 115 of 451? (Rule 228(5): 40 CFR 273.33(a)(3)(ii))	UWR	[] ___ NI N/A
9. Are batteries or container(s) of batteries labeled w/ either: "UNIVERSAL WASTE-BATTERIES" or "WASTE BATTERIES" or "USED BATTERIES". (Rule 228 (5): 40 CFR 273.34(a))	UWR	[] ___ NI N/A

Universal Waste Pesticides: (Rule 228(5): 40 CFR 273.33(b))

10. Pesticides in containers that are closed, structurally sound & compatible w/ pesticide? (Rule 228(5): 40 CFR 273.33(b)(1))	UWR	[] ___ NI N/A
11. If original container is in poor condition, is it over-packed in acceptable container? Rule 228(5): 40 CFR 273.33(b)(2))	UWR	[] ___ NI N/A
12. If stored in tank, are requirements of 40 CFR Part 265, Subpart J met? [USE TANK CHECKLIST] (Rule 228(5):40 CFR 273.33(b)(3))	UWR	[] ___ NI N/A
13. If stored in transport vehicle, is it closed, structurally sound & compatible with pesticides? (Rule 228(5): 40 CFR 273.33(b)(4))	UWR	[] ___ NI N/A
14. Are pesticides in a container, tank or transport vehicle labeled either "UNIVERSAL WASTE-PESTICIDE(s)" or "WASTE-PESTICIDE(s)" (Rule 228(5): 40 CFR 273.34(b)(1 & 2) & (c)(1 & 2)) [See 273.14(c) if 273.34(b) not possible]	UWR	[] ___ NI N/A

Universal Waste Mercury Devices (Thermostats, Mercury switch, Mercury thermometer, or a waste device which contains only elemental mercury): (Rule 228(5): 40 CFR 273.33(c))

YES NO

15. Are mercury devices that show evidence of leakage, spillage, or damage that could cause leaks contained? 273.33(c)(1)	UWR	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
16. If mercury devices are contained, were containers closed, structurally sound, compatible w/ contents & lack evidence of leakage, spillage or damage that could cause leakage? (Rule 228(5):40 CFR 273.33(c)(1))	UWR	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
17. If ampules are removed :				
a. does facility try to prevent breakage & is removal done over containment device? (Rule 228(5): 40 CFR 273.33(c)(2)(i & ii))	UWR	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
b. is clean-up system available to transfer spilled material to another container & used immediately? (Rule 228(5): 40 CFR 273.33(c)(2)(iii & iv))	UWR	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
c. is area well ventilated & monitored? (Rule 228(5): CFR 273.33(c)(2) (v))	UWR	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
d. are employees familiar w/ proper waste handling & emergency procedures? (Rule 228(5): 40 CFR 273.33(c)(2)(vi))	UWR	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
e. are ampules stored in closed, non-leaking container? (Rule 228(5): 40 CFR 273.33(c)(2)(vi))	UWR	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
f. are ampules packed in container with packing material? (Rule 228(5): 40 CFR 273.33(c)(2)(vii))	UWR	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
18. If mercury or clean-up residues are generated is hazardous waste determination performed? (Rule 228(5): 40 CFR 273.33(c)(3)(i))	UWR	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
a. If waste is characteristic is it managed in compliance w/ Part 260-272? (Rule 228(5): 40 CFR 273.33(c)(3)(ii))	UWR	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
b. If waste isn't characteristic is it managed in compliance w/ Parts 115 & 121 of Act 451? (Rule 228(5): 40 CFR 273.33(c)(3)(iii))	UWR	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
19. Are thermostats or containers of thermostats labeled either "UNIVERSAL WASTE-MERCURY (name of waste [thermostat, switch, thermometer, or device](s))" or "WASTE MERCURY (name of waste)(s)" or "USED MERCURY (name of waste)(s)". (rule 228(5):40 CFR 273.34(d))	UWR	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A

Universal Waste Electric Lamps: (Rule 228(5))

20. Are lamps crushed or broken? (electric lamps shall not be crushed or broken) (Rule 228(5)(d))	UWR	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
21. Are lamps managed in manner to prevent breakage or release of any universal waste or components of universal waste by containment in structurally sound packaging compatible w/ contents of lamps & able to prevent breakage? (Rule 228(5)(d))	UWR	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
22. Are lamp fragments or residues, and all lamps that show evidence of breakage, leakage, or damage that could cause the release of mercury or other hazardous constituents to the environment immediately contained in packaging that is structurally sound & compatible w/ the content ? (Rule 228(5)(d))	UWR	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
23. If lamp fragment or residue waste generated, does facility determine whether it is hazardous? (Rule 228(5)(d))	UWR	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
a. If waste is characteristic is it managed in compliance w/ Part 111, Act 451: 40 CFR Part 260-272? (228(5)(d))	UWR	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
b. If waste is not characteristic is it managed in compliance w/ Part 115 of Act 451? (228(5)(d))	UWR	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
24. Are lamps or packaging containing lamps labeled either "UNIVERSAL WASTE ELECTRIC LAMP(S)" or "WASTE ELECTRIC LAMP(s)" or "USED ELECTRIC LAMP(s)". (Rule 228(5)(d))	UWR	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A

ACCUMULATION TIME LIMITS (Rule 228(5): 40 CFR 273.35)

25. Accumulated less than one year? (Rule 228(5): 40 CFR 273.35(a)) OR (if no go to question 26)	UWR	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
26. If accumulated over one year, is accumulation necessary to facilitate proper recovery, treatment or disposal? (Rule 228(5): 40 CFR 273.35(b))	UWR	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
27. Is the length of time universal wastes are stored documented by one of the following:				
a. mark or label container with earliest date when universal waste became a waste? (Rule 228(5): 40 CFR 273.35(c)(1))	UWR	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
b. mark or label individual items of universal waste with the earliest date it became a waste? (Rule 228(5): 40 CFR: 273.35(c)(2))	UWR	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
c. maintain inventory system on-site that identifies the date an item became a universal waste? (Rule 228(5): 40 CFR 273.35(c)(3))	UWR	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
d. maintain inventory system on-site that identifies the earliest date items in a group became universal waste? (Rule 228(5): 40 CFR (273.35(c)(4))	UWR	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
e. place universal waste in a specific accumulation area and identify start date or date received? (Rule 228(5): 40 CFR (273.35(c)(5))	UWR	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A
f. other method with length of time universal waste accumulated and date it became a waste or received? (Rule 228(5): 40 CFR (273.35(c)(6))	UWR	<input type="checkbox"/>	<input type="checkbox"/>	NI N/A

EMPLOYEE TRAINING (Rule 228(5): 40 CFR 273.36)

YES NO

28. Are employees familiar w/ universal waste handling/emergency procedures, relative to their responsibilities? (Rule 228(5): 40 CFR 273.36))	UWR	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> NI N/A
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RESPONSE TO RELEASE (Rule 228(5): 40 CFR 273.37)

29. Are releases of universal waste & other residue immediately contained? (Rule 228(5): 40 CFR 273.37(a))	UWR	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> NI N/A
30. Is material from release characterized? (Rule 228(5): 40 CFR 273.37(b))	UWR	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> NI N/A
31. If released material is hazardous waste is it managed in accordance w/ Parts 260 – 271? (Rule 228(5): 40 CFR 273.37(b))	UWR	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> NI N/A

OFF-SITE SHIPMENTS (Rule 228(5): 40 CFR 273.38)

32. Is waste sent to another handler, destination facility or foreign destination? (Rule 228(5): 273.38(a))	UWR	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> NI N/A
33. If waste is a hazardous material are DOT requirements met w/ regard to package/labels/placards/shipping papers? (Rule 228(5): 273.38(c))	UWR	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> NI N/A
34. Prior to shipping universal waste off-site does receiver agree to receive shipment? (Rule 228(5): 40CFR :273.38(d))	UWR	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> NI N/A
35. If facility self-transport waste did it comply w/ universal waste transporter requirements? (Rule 228(5)(c):40 CFR 273.38(b))	UWR	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> NI N/A
36. If universal waste shipped off-site and is rejected by other handler or destination facility, does the originating handler either:		
a. receive the waste back? (Rule 228(5): 40 CFR 273.38(e)(1))	UWR	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> NI N/A
b. agree to where shipment will be sent? (Rule 228(5): 40 CFR 273.38(e)(1))	UWR	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> NI N/A
37. If a handler rejects part or full load from another handler, does the receiving handler contact the originating handler & discuss either:		
a. sending waste back to originating handler? : (Rule 228(5): 40 CFR 273.38(f)(1))	UWR	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> NI N/A
b. where shipment will be sent? (Rule 228(5): 40 CFR 273.38(f)(2))	UWR	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> NI N/A
38. If handler receives shipment of hazardous waste that isn't universal waste, is MDEQ immediately notified? (Rule 228(5): 40 CFR 273.38(g))	UWR	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> NI N/A
39. If handler receives shipment of non-hazardous, non-universal waste is waste managed in accordance w/ solid waste regulations? (Rule 228(5): 40 CFR 273.38(h))	UWR	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> NI N/A

TRACKING UNIVERSAL WASTE SHIPMENTS (Rule 228(5); 40 CFR 273.39)

40. If universal waste is received from another handler is a record of each shipment kept? (Rule 228(5) 40 CFR 273.39(a))	UWR	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> NI N/A
41. Does the record include:		
a. name & address of the originating handler or foreign shipper? (Rule 228(5): 40 CFR 273.39(a)(1))	UWR	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> NI N/A
b. quantity of each type of universal waste? (Rule 228(5): 40 CFR 273.39(a)(2))	UWR	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> NI N/A
c. date received? (Rule 228(5): 40 CFR 273.39(a)(3))	UWR	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> NI N/A
42. If universal waste is shipped to another handler is a record of each shipment kept? (Rule 228(5): 40 CFR 273.39(b))	UWR	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> NI N/A
43. Does the record include:		
a. the name & address of the universal waste handler, designation facility or foreign destination? (Rule 228(5): 40 CFR 273.39 (b)(1))	UWR	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> NI N/A
b. quantity of each type of universal waste? (Rule 228(5): 40 CFR 273.39(b)(2))	UWR	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> NI N/A
c. date shipped? (Rule 228(5): 40 CFR 273.39(b)(3))	UWR	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> NI N/A
44. Are records kept for 3 years? (Rule 228(5): 40 CFR 273.39(c)(1&2))	UWR	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> NI N/A

EXPORTS (Rule 228(5): 40 CFR 273.40)

45. If waste is sent to a foreign destination does handler:		
a. comply w/ primary exporter requirements in 40 CFR 262.53, 262.56(a)(1-4 & 6) & (b) & 262.57? (Rule 228(5): 40 CFR 273.40(a))	UWR	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> NI N/A
b. export w/ consent of receiving country & in compliance with Acknowledgment of Consent, Subpart E, .262? (Rule 228(5): 40 CFR 273.40(b))	UWR	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> NI N/A
c. provide copy of Acknowledgement of Consent to transporter? (Rule 228(5): 40 CFR 273.40(c))	UWR	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> NI N/A

